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 11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

FENWICK & WEST LLP  
 ATTORNEYS AT LAW  
 SAN FRANCISCO

14 HAIDEE ESTRELLA, ANGELICA ARITA,  
 15 DALE MAYS and BEVERLY HALL, an  
 individually and on behalf of themselves and  
 16 all others similarly situated, and on behalf of  
 the general public,

17 Plaintiffs,

18 v.

19 FREEDOM FINANCIAL NETWORK, LLC a  
 Delaware limited liability company;  
 20 FREEDOM DEBT RELIEF, INC., a California  
 corporation; FREEDOM DEBT RELIEF,  
 21 LLC, a Delaware limited liability company;  
 22 GLOBAL CLIENT SOLUTIONS, LLC;  
 ROCKY MOUNTAIN BANK AND TRUST;  
 23 ANDREW HOUSSER; AND BRADFORD  
 STROH and DOES 1 through 100,

24 Defendants.

Case No. CV-09-03156 SI

**STIPULATION SETTING TIME TO  
 RESPOND TO THIRD AMENDED  
 COMPLAINT**

1           **WHEREAS**, on October 3, 2011, the Court issued an order (“Order”) granting plaintiffs  
2 leave to amend;

3           **WHEREAS**, the Order was without prejudice to defendants’ right to move to compel to  
4 arbitration the claims of newly added plaintiffs, Ms. Mays and Ms. Hall;

5           **WHEREAS**, the Order did not affect the Court’s prior order of July 5, 2011, granting  
6 defendants’ motion to compel the claims of each of the prior named plaintiffs to arbitration;

7           **WHEREAS**, pursuant to the Order, plaintiffs filed a Third Amended Complaint on  
8 October 7, 2011, and a response is due October 24, 2011 under Fed. R. Civ. P. 6(d) and 15(a)(3);

9           **WHEREAS**, as contemplated by the Order, certain defendants will be filing a motion to  
10 compel arbitration by October 25, 2011;

11           **WHEREAS**, because the Court’s decision on the motion to compel arbitration will likely  
12 affect the nature of defendants’ responses to the Third Amended Complaint, and could even  
13 render such responses unnecessary, all Parties agree that the time to respond to the Third  
14 Amended Complaint should be set for a reasonable period following the Court’s decision on the  
15 upcoming motion to compel arbitration;

16           **WHEREAS**, in setting the response date, the Parties are not altering the date of any event  
17 or deadline already fixed by Court Order;

18           **IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 6-1(a), by and between  
19 the undersigned counsel for the Parties that:

20           1.       Any motion to compel arbitration by defendants shall be filed by October 25,  
21 2011;

22           2.       Pursuant to Civil L.R. 6-1(a), defendants need not answer, move or otherwise  
23 respond to the Third Amended Complaint until after the Court has ruled on defendants’ motion to  
24 compel arbitration; and

25           3.       In the event that the defendants’ motion to compel arbitration is denied, defendants  
26 will respond to the Third Amended Complaint with fifteen (15) days from service of the Court’s  
27 order.  
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1 Dated: October 19, 2011

KERSHAW, CUTTER, & RATINOFF LLP  
CLARK & MARKHAM LLP  
LAW OFFICES OF BARRON E. RAMOS  
CHARLES E. AMES, P.C.  
THE CROSLEY LAW FIRM, P.C.  
WEXLER WALLACE LLP

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4  
5 By: /s/  
Stuart C. Talley

6 Attorneys for Plaintiffs

7  
8 Dated: October 19, 2011

FENWICK & WEST LLP

9 By: /s/  
Kevin P. Muck

10 Attorneys for Defendants FREEDOM FINANCIAL  
11 NETWORK, LLC, FREEDOM DEBT RELIEF, INC. and  
12 FREEDOM DEBT RELIEF, LLC

13 Dated: October 19, 2011

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

14 By: /s/  
Allen Ruby

15 Attorneys for Defendants  
16 BRADFORD STROH and ANDREW HOUSSER

17 Dated: October 19, 2011

GREENSPOON MARDER, P.A.

18 By: /s/  
Rebecca Bratter

19 Attorneys for Defendants GLOBAL CLIENT  
20 SOLUTIONS, LLC and ROCKY MOUNTAIN BANK &  
21 TRUST

22 Pursuant to General Order No. 45 Section X(B), all of the signatories concur in the filing of this  
23 stipulation.

24 Dated: October 19, 2011

FENWICK & WEST LLP

25 By: /s/ Jennifer C. Bretan  
Jennifer C. Bretan

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